

**To:** Robinson, Jeffrey[Robinson.Jeffrey@epa.gov]  
**From:** Verhalen, Frances[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DA20B77D29D744A3AAEC0CF67C7718BA-VERHALEN, FRANCES]  
**Sent:** Thur 9/30/2021 8:19:18 PM (UTC)  
**Subject:** RE: Discrepancy in Sasol's EO emissions

Yes. Also, adjusting talking points to indicate what I told Kim.

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**From:** Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>  
**Sent:** Thursday, September 30, 2021 2:55 PM  
**To:** Verhalen, Frances <verhalen.frances@epa.gov>  
**Subject:** RE: Discrepancy in Sasol's EO emissions

If you can do so, please make sure we articulate the basis (perf. Testing???) why they revised as you discuss. You may already have those points in your talking points. Thanks.

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**From:** Verhalen, Frances <[verhalen.frances@epa.gov](mailto:verhalen.frances@epa.gov)>  
**Sent:** Thursday, September 30, 2021 2:50 PM  
**To:** Terrell, Kimberly A <[kterrell1@tulane.edu](mailto:kterrell1@tulane.edu)>  
**Cc:** Tejada, Matthew <[Tejada.Matthew@epa.gov](mailto:Tejada.Matthew@epa.gov)>; Jordan, Lisa W <[lwjordan@tulane.edu](mailto:lwjordan@tulane.edu)>; Vaughn, Gloria <[Vaughn.Gloria@epa.gov](mailto:Vaughn.Gloria@epa.gov)>; Robinson, Jeffrey <[Robinson.Jeffrey@epa.gov](mailto:Robinson.Jeffrey@epa.gov)>; Casso, Ruben <[Casso.Ruben@epa.gov](mailto:Casso.Ruben@epa.gov)>; Riddick, Nia <[Riddick.Nia@epa.gov](mailto:Riddick.Nia@epa.gov)>  
**Subject:** RE: Discrepancy in Sasol's EO emissions

Kim, thank you for pointing this out. EPA does not intend to mislead anyone. I am making some changes to the slide.

I will convey that EPA used the 12,640 lbs from Sasol's 2014 emission inventory submitted to LDEQ in our NATA model, as this was the data that we had at that time. Subsequently, Sasol revised its emissions inventory.

Fran

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**From:** Terrell, Kimberly A <[kterrell1@tulane.edu](mailto:kterrell1@tulane.edu)>  
**Sent:** Thursday, September 30, 2021 2:01 PM  
**To:** Verhalen, Frances <[verhalen.frances@epa.gov](mailto:verhalen.frances@epa.gov)>  
**Cc:** Tejada, Matthew <[Tejada.Matthew@epa.gov](mailto:Tejada.Matthew@epa.gov)>; Jordan, Lisa W <[lwjordan@tulane.edu](mailto:lwjordan@tulane.edu)>; Vaughn, Gloria <[Vaughn.Gloria@epa.gov](mailto:Vaughn.Gloria@epa.gov)>  
**Subject:** Discrepancy in Sasol's EO emissions

Dear Frances Verhalen,

We are looking forward to the EPA meeting tonight RE Sasol. However, there is a major discrepancy in the ethylene oxide data that

EPA Region 6 provided in its draft presentation. As you are aware, in Oct 2019, Sasol submitted recalculated ethylene oxide emissions for 2014-2018. However, EPA’s graph uses the original reported value (12,640 lbs) for 2014, followed by the recalculated values (~2,000 lbs) for 2017-2018, in an apparent attempt to portray an emissions reduction.

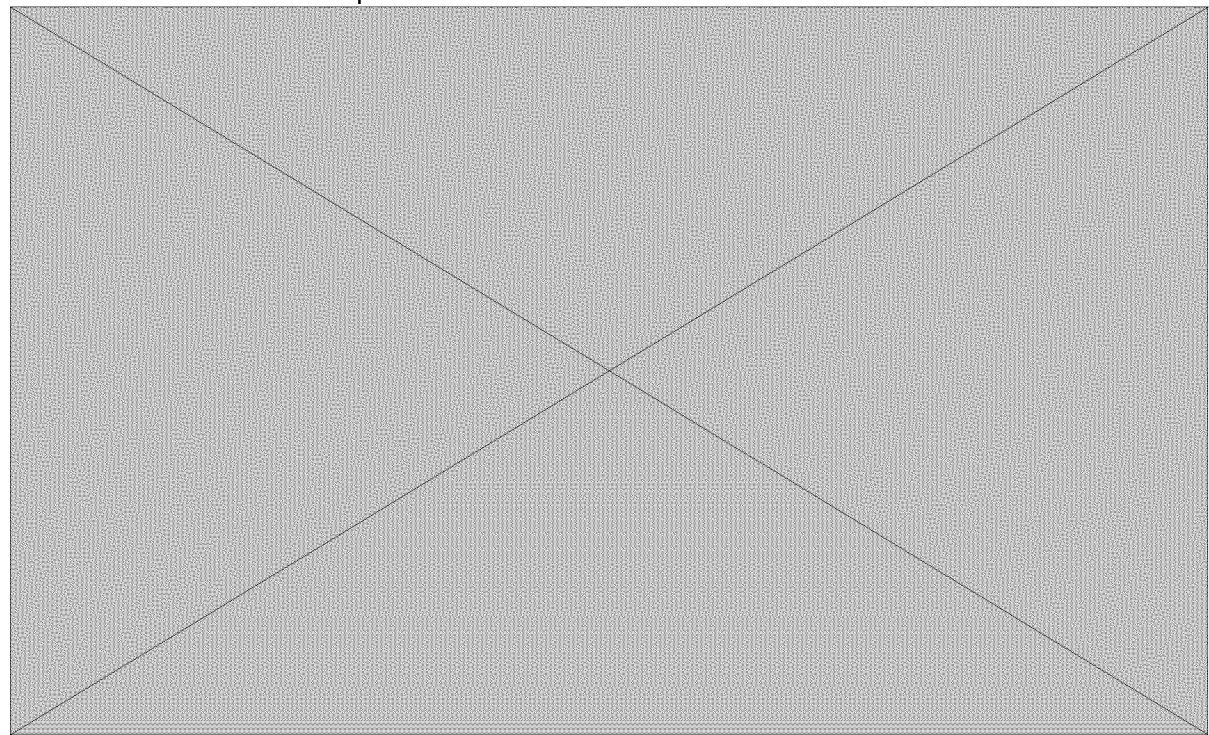
Because it combines original and recalculated data in a graph that purports to portray temporal trends, EPA’s approach is blatantly misleading. We request that this graph be corrected to show Sasol’s recalculated emissions for 2014-2020 (including 2015 and 2016, which were omitted from the Powerpoint). If EPA intends to present the original emissions values, these values should be presented as a separate data series.

I have included the slide in question below, along with a corrected version, based on Sasol’s recalculated 2014 emissions data. Please feel free to follow up with any questions. We are sincerely looking forward to the opportunity to meet with you tonight.

Warmly,

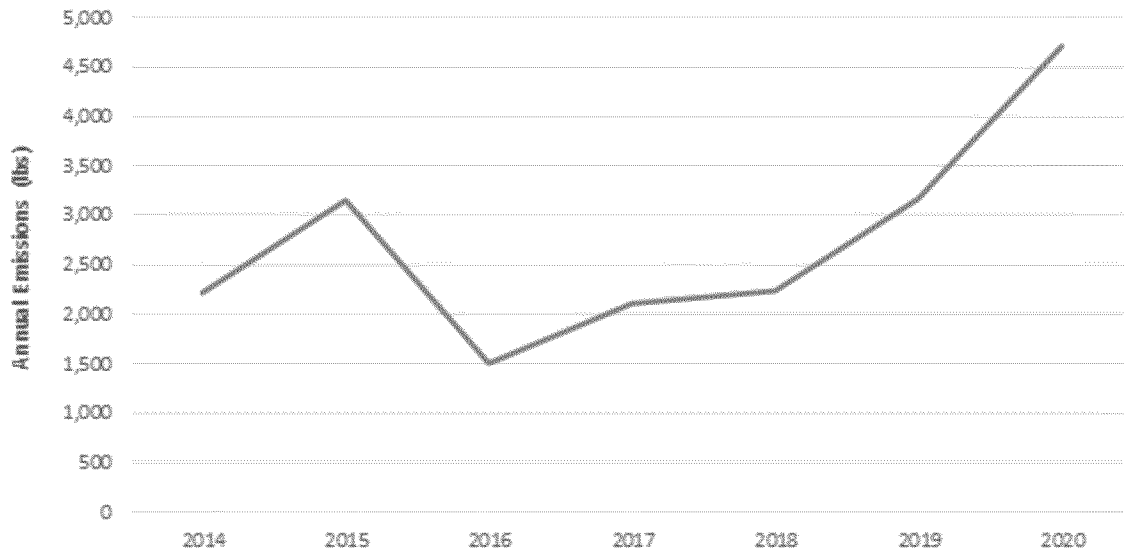
Kim

From slide 19 of EPA’s Powerpoint:



Prepared from LDEQ emissions inventory:

Self-Reported Emissions of Ethylene Oxide by Sasol's Lake Charles Chemical Complex, from LDEQ's Emissions Inventory



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